

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

JANE DOE, f/k/a KRISTY ALTHAUS,
an individual,

Plaintiff,

v.

AYLO GLOBAL ENTERTAINMENT
INC., a Delaware corporation; AYLO
USA INCORPORATED, a Delaware
corporation; AYLO BILLING US
CORP., a Delaware corporation;
ETHICAL CAPITAL PARTNERS, a
foreign entity; MINDGEEK S.A.R.L., a
foreign entity; MG FREESITES, LTD.,
d/b/a "PORN HUB," a foreign entity;
MINDGEEK USA INCORPORATED,
a Delaware corporation; 9219-1568
QUEBEC, INC., a foreign entity; and
MG BILLING US CORP., a Delaware
corporation,

Defendants.

CASE NO. CV 23-7488-MWF(AGR_x)

**ORDER GRANTING
STIPULATION TO STRIKE
DISMISSED CLAIMS AND PARTY
AND FILE THIRD AMENDED
COMPLAINT**

ORDER

Plaintiff shall file a Third Amended Complaint (“TAC”) on or before the later of **October 10, 2025**, or within fourteen (14) days of this Order.

Plaintiff shall remove *at least* the following Paragraphs from her Second Amended Complaint (“SAC”) (and renumber the TAC accordingly):

- Paragraphs 219-241
- Paragraphs 812-829
- Paragraphs 851-909

In addition, Plaintiff shall strike Ethical Capital Partners as a named party defendant and shall update the caption and SAC Paragraphs 120-138 accordingly. Plaintiff similarly shall relocate and reframe SAC Paragraphs 353-437.

Plaintiff shall also review all allegations in the SAC and remove any allegations, or portions thereof, on which she is no longer relying for her remaining causes of action.

Defendants Aylo Global Entertainment, Inc., Aylo USA Incorporated, Aylo Billing US Corp., Aylo Freesites Ltd., 9219-1568 Quebec, Inc., and Aylo Premium Ltd (collectively, the “Aylo Defendants”) shall file an Answer to the TAC on or before the later of **October 30, 2025**, or within twenty (20) days of filing of the TAC.


Following the filing of the Aylo Defendants’ Answer, Plaintiff and the Aylo Defendants shall conduct a Rule 26 conference and submit a joint report.

Defendant Aylo Holdings S.à r.l. shall retain all rights, including, but not limited to (i) the right to respond to any amended complaint that may be filed following the completion of the limited jurisdictional discovery ordered by the Court (ECF 142, at 8); and (ii) the right to renew its motion to dismiss pursuant to Rule 12(b)(2) following completion of said jurisdictional discovery. Provided that Plaintiff’s amendment of the complaint following the jurisdictional discovery ordered by the Court (ECF 142, at 8) is limited to only new jurisdictional

1 allegations, Aylo Holdings S.à r.l. shall not file a Rule 12(b)(6) motion challenging
2 any amended complaint.

3 **IT IS SO ORDERED.**

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5 Dated: September 23, 2025

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7 MICHAEL W. FITZGERALD
8 United States District Judge
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